

**Re: LM: Status Report due April 2 by 12 noon**

Dan Singer <dan@dasingerlaw.com>

Wed 4/1/2020 12:45 PM

To: Nina Khan <nkhan@mslegal.com>; vworms@victorawormspc.com <vworms@victorawormspc.com>

Cc: Sergey Sokolov <ssokolov@mslegal.com>; Ksenia Polyakova <kpolyakova@mslegal.com>; Bruce Marks <marks@mslegal.com>; Dan Singer <dan@dasingerlaw.com>

Nina,

I hope all is well with you and that you and your family are managing to stay safe and healthy in this crazy time.

I have reviewed the draft report which you forwarded yesterday. While it should be beyond obvious, I do not agree with any of the turnover you are seeking or anything else which which you are seeking in same. Indeed, the only thing I agree with is that settlement should be brought to a conclusion as quickly and that, regardless, there are severe practical restrictions on what can be accomplished in the current environment. As such, there is no point in us speaking at present as there is nothing to "meet and confer" about at this time. I will be submitting a separate status report to the court tomorrow. It is possible that after you have reviewed my status report it may make sense to address certain issues on Friday. We can cross that bridge when we come to it.

I look forward to our conference with the Court next week.

Best regards.

Dan

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**From:** Nina Khan <nkhan@mslegal.com>

**Sent:** Wednesday, April 1, 2020 11:21 AM

**To:** Dan Singer <dan@dasingerlaw.com>; vworms@victorawormspc.com <vworms@victorawormspc.com>

**Cc:** Sergey Sokolov <ssokolov@mslegal.com>; Ksenia Polyakova <kpolyakova@mslegal.com>; Bruce Marks <marks@mslegal.com>

**Subject:** RE: LM: Status Report due April 2 by 12 noon

Mr. Singer,

Reaching out to you yet again re our meet and confer. Mr. Worms has provided his input. As you know, the status report is due tomorrow before noon. When can we talk today?

**From:** Nina Khan

**Sent:** Tuesday, March 31, 2020 1:20 PM

**To:** Dan Singer <dan@dasingerlaw.com>; vworms@victorawormspc.com

**Cc:** Sergey Sokolov <ssokolov@mslegal.com>; Ksenia Polyakova <kpolyakova@mslegal.com>; Bruce Marks <marks@mslegal.com>

**Subject:** RE: LM: Status Report due April 2 by 12 noon

**Importance:** High

Messrs. Singer and Worm:

Following up on yesterday's email:

1. Attached please find the draft status report; and
2. Please advise re your availability either today or tomorrow.

Thank you.

**From:** Nina Khan

**Sent:** Monday, March 30, 2020 2:51 PM

**To:** Dan Singer <[dan@dasingerlaw.com](mailto:dan@dasingerlaw.com)>; [vworms@victorawormspc.com](mailto:vworms@victorawormspc.com)

**Cc:** Sergey Sokolov <[ssokolov@mslegal.com](mailto:ssokolov@mslegal.com)>; Ksenia Polyakova <[kpolyakova@mslegal.com](mailto:kpolyakova@mslegal.com)>; Bruce Marks <[marks@mslegal.com](mailto:marks@mslegal.com)>

**Subject:** LM: Status Report due April 2 by 12 noon

**Importance:** High

Messrs. Singer and Worm:

The status report pursuant to CMO#3 (DIA ECF 15; Rozhkov ECF 15) is due on Thursday, April 2, by 12 noon.

For our "meet and confer" teleconference on scheduling issues, please advise re your availability either tomorrow afternoon or on Wednesday.

We intend to circulate a draft status report tomorrow morning.

Nina Farzana Khan, Esquire

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